

Annual Report

Office of the Ethics
Commissioner of Alberta

April 1, 2018 to March 31, 2019

Table of Contents

COMMISSIONER'S MESSAGE2
MANDATE.....	.3
CONFLICTS OF INTEREST ACT.....	.3
LOBBYISTS ACT.....	.4
DISCLOSURE PROCESS5
REQUESTS FOR ADVICE.....	.6
REQUESTS FOR INVESTIGATION9
REQUESTS FOR INFORMATION.....	.10
BUDGET AND FISCAL UPDATE.....	.10
EVENTS AND CONFERENCES11
PUBLICATIONS.....	.11
LOBBYISTS ACT AND REGISTRY UPDATE12

COMMISSIONER'S MESSAGE



I am pleased to submit the annual report for the Office of the Ethics Commissioner and Registrar of Lobbyists for 2018-2019.

The office was extremely busy during the reporting period. In December of 2017, the *Conflicts of Interest Act* was amended to require 105 (now 112) agencies, boards, commissions and post-secondary institutions to have codes of conduct that met certain statutory requirements. The codes of conduct were to be submitted to our office by May 2018 for approval. On first review, only nine codes of conduct met the statutory requirements. Some codes ended up requiring five or six reviews. It was also difficult to get compliance from the post-secondary institutions. The last code of the initial 105 was finally approved on April 16, 2019. We continue to approve amendments to codes of conduct.

Fifty-four Chief Executive Officers and Presidents under the amendments to the *Act* are now required to provide financial disclosure to our office. The requirement is to be phased in so that all are to provide financial disclosure no later than April of 2020.

During the reporting year, the Standing Committee on Resource Stewardship carried out a statutory review of the *Conflicts of Interest Act*. Our Office made a presentation to the Committee suggesting 21 changes to the legislation. The Committee completed its final report in August 2018. No action has been taken with respect to the Committee's report.

This past year, close to 300 Members of the Legislative Assembly, Designated Office Holders, Designated Senior Officials and political staff were required to provide financial disclosure. Four Members, one Designated Office Holder, three Designated Senior Officials and 23 political staff failed to comply with the deadline for filing their financial disclosure. Of those who missed the deadline, one MLA, one Designated Senior Official and six political staff were assessed an administrative penalty. Member Prab Gill received an administrative penalty for a third time.

There were 403 requests for advice during the year. There were 27 request for information. There were also 107 requests for investigations. Most requests for investigations were for matters outside of the jurisdiction of the Office. Three investigations were carried out. One involved an appeal by a member of the public service of a decision of a deputy minister. A second investigation involved allegations against the former of Chief of Staff of Premier Notley, John Heaney, and the final investigation involved a request into conduct of Jason Kenney and Prasad Panda.

MANDATE

The *Conflicts of Interest Act* was passed in 1991, S.A. Chapter C.22.1 (now R.S.A, Chapter C-23), and created the Office of the Ethics Commissioner of Alberta. The Office is also responsible for the administration of the *Lobbyists Act*, Statutes of Alberta 2007, Chapter L-20.5 (“*Lobbyists Act*”), under which the Ethics Commissioner appoints the Lobbyists Registrar. The Ethics Commissioner is an Officer of the Legislature and is appointed by an Order in Council following a motion in the Legislative Assembly approving the appointment.

The Ethics Commissioner reports to the Legislative Assembly through the Speaker and files annual reports and investigation reports with the Speaker of the House for tabling in the Legislature. The Ethics Commissioner presents budgetary estimates through the Standing Committee on Legislative Offices. The Legislative Assembly approves the budget for the Office of the Ethics Commissioner.

CONFLICTS OF INTEREST ACT

The preamble of the *Conflicts of Interest Act* sets out some of the basic ethical requirements:

- Ethical conduct of elected officials is expected in democracies;
- Members of the Legislative Assembly serve Albertans most effectively if they come from a broad spectrum of occupations and continue to participate actively in the community;
- Members of the Legislative Assembly are expected to perform their duties of office and arrange their private affairs in a manner which promotes public confidence and trust in the integrity of each Member, maintains the Assembly's dignity and justifies the respect in which society holds the Assembly and its Members;
- Members of the Legislative Assembly, in reconciling their duties of office and their private interests, are expected to act with integrity and impartiality; and
- Ministers and their staff must avoid conduct that violates public trust or creates an appearance of impropriety.

Through the *Conflicts of Interest Act*, and the *Public Service Act*, the Office of the Ethics Commissioner:

- Promotes an understanding of Members of the Legislative Assembly, Designated Office Holder, Designated Senior Official, and political staff obligations under the Acts;
- Receives financial disclosure statements from Members, Designated Senior Officials, Designated Office Holders as defined in the *Public Service Act*, and political staff in the Premier's and Ministers' offices;
- Provides advice to Members and former Members, current or former political staff, Designated Senior Officials, and Designated Office Holders;
- Provides advice to individuals governed by post-employment restrictions; and
- Investigates alleged breaches of the *Conflicts of Interest Act* by Members, Designated Senior Officials, political staff and breaches of the conflicts of interest and post-employment provisions of the *Public Service Act* by Designated Office Holders.

Upon receiving an investigation report of conduct of a Member from the Office of the Ethics Commissioner, the Speaker is required to release the report publicly. If the Legislature is in session, the report is tabled in the Legislature. If the Legislature is not in session, the report is filed as an intersessional tabling. If the Ethics Commissioner recommends a sanction in an investigation report, the Legislative Assembly debates and votes on the investigation report within 15 days after the report is tabled, or at such other time determined by a resolution of the Legislative Assembly.

Under section 29 of the *Conflicts of Interest Act*, the Legislative Assembly may accept or reject the findings of the Office of the Ethics Commissioner or substitute its own findings. If the Legislative Assembly determines there is a breach, it may impose the sanction recommended by the Ethics Commissioner, any other sanction referred to in section 27(2) which it considers appropriate, or the Legislative Assembly may refrain from imposing a sanction. The Legislative Assembly has final authority about disciplinary matters relating to its Members.

Under the provisions of the *Conflicts of Interest Act*, reports of an investigation involving a Designated Senior Official may only be disclosed to the responsible Minister and the Chief Executive Officer or Chair of the Board of the agency. Investigations of political staff serving in the Office of the Premier or a Minister under the *Conflicts of Interest Act* are disclosed to either the Premier or the relevant Minister.

Reports of an investigation under the *Public Service Act* involving a Designated Office Holder may only be disclosed by the Commissioner to the Deputy Minister of Executive Council and the relevant Minister if it pertains to a Deputy Minister, the Premier if it pertains to the Deputy Minister of Executive Council, or, if it pertains to a Designated Office Holder, other than a Deputy Minister, to the Minister responsible for that entity.

The Office of the Ethics Commissioner is not authorized to publicly release any of these reports.

LOBBYISTS ACT

The *Lobbyists Act* is intended to enhance the integrity and accountability of government by fostering openness and transparency about who is influencing decisions made by public office holders. The *Lobbyists Act* establishes two categories of lobbyists: consultant lobbyists and organization lobbyists. The *Lobbyists Act* prohibits a person from lobbying the Government or a prescribed provincial entity and providing paid advice at the same time, and from lobbying in respect of a subject matter if a person associated with them provides paid advice to Government or a prescribed provincial entity on that subject matter (and vice versa), unless an exemption is granted.

The *Lobbyists Act* preamble describes its basic principles:

- Free and open access to government is an important matter of public interest;
- Lobbying public office holders is a legitimate activity;
- The public and public office holders should know who is engaged in lobbying activities;
- A registration system of paid lobbyists should not impede free and open access to government; and
- The public and public office holders should know who is contracting with the Government of Alberta and provincial entities.

During the fiscal year, the requirement to register as an organization lobbyist applied once a lobbyist performs, or is required to perform, over 50 hours of lobbying annually (including preparation time), either individually or collectively with others in their organization. However, some lobbyists, as a matter of practice, register before they reach the threshold. Consultant lobbyists are required to register within ten days of entering into an undertaking to lobby. The Office of the Ethics Commissioner maintains a web-based lobbyist registry system and database. It is searchable by the general public. The registry provides openness and transparency by:

- Recording the identities and activities of people paid to lobby public office holders;
- Recording the identities of organizations and clients who pay lobbyists to lobby public office holders on their behalf;
- Allowing lobbyists to file, update, renew and terminate registrations by submitting returns and notices for acceptance into the system; and
- Allowing public scrutiny.

The registry allows access 24 hours per day, seven days per week, for both the public and lobbyists.

The Ethics Commissioner may authorize any individual in the Office of the Ethics Commissioner to act as Registrar and to perform any of the powers, duties or functions of the Registrar under the *Lobbyists Act*. The Ethics Commissioner delegates the administrative and enforcement responsibilities of the Registrar to the Lobbyist Registrar, who is also the General Counsel to the Ethics Commissioner.

Under the *Lobbyists Act*, certain powers and responsibilities are reserved for the Ethics Commissioner and cannot be delegated, including:

- Exemptions from the contracting prohibitions in s. 6 of the *Lobbyists Act* (eg. allowing a person to provide paid advice to government while at the same time lobbying the government), with or without conditions;
- Issuing advisory opinions and interpretation bulletins; and
- Banning serious offenders from lobbying.

The Ethics Commissioner reports to the Legislative Assembly through the Speaker on investigations under the *Lobbyists Act*. If the House is sitting, the report is tabled. If the House is not sitting, the report is distributed to Members, after which the Ethics Commissioner may make the report public. A report provided when the House is not sitting is tabled when the House next sits.

DISCLOSURE PROCESS

This year, all Members of the Legislative Assembly, Designated Office Holders, Designated Senior Officials and political staff complied with their obligation to file disclosure statements. However, several were late in filing and had to be reminded they were late and would be subject to an administrative penalty if the disclosure was not filed within a set period of time. This year, a number of administrative penalties were assessed.

Disclosure statements include information about the Member, Designated Office Holder, Designated Senior Official or political staff, their spouse or adult interdependent partner and minor children.

It requires disclosing:

- All assets, ownership of publicly traded securities, liabilities and financial interests of any private corporation in their control;
- Any legal proceedings brought against them and any taxes owing.

The Office of the Ethics Commissioner received private disclosures from 87 Members and met with each Member personally to discuss their disclosure. Previously, Members' public disclosure statements were released through the Office of the Clerk of the Legislative Assembly. However, as a result of the changes to the *Conflicts of Interest Act* in December 2014, public disclosure statements are now posted on the Office of the Ethics Commissioner website sometime after the Member's meeting with the Ethics Commissioner.

Designated Office Holders are required to submit disclosure statements under the *Public Service Act* and Designated Senior Officials are required to submit disclosure statements under the *Conflicts of Interest Act*. Disclosure meetings were conducted with all Designated Office Holders in 2018-2019 and, in 2019-2020, disclosure meetings will be held with Designated Senior Officials as they become subject to the reporting requirements. There are no public disclosure statements for Designated Office Holders or Designated Senior Officials.

Senior political staff working in the Office of the Premier, certain Premier's Office staff, Chiefs of Staff, Press Secretaries and Ministerial Assistants are also required to provide financial disclosure to the Office of the Ethics Commissioner as a result of the changes to the scope of the Act in December 2014. There are no public disclosure statements for political staff.

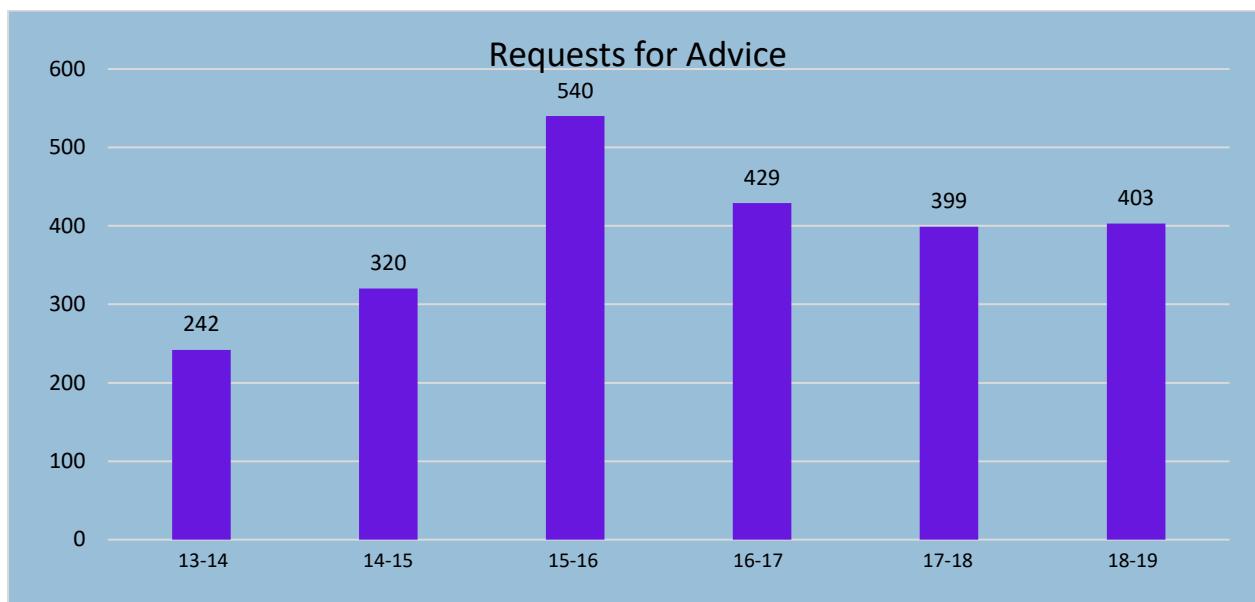
Percentage of individuals who submitted all required disclosure information by the deadline

Category of Filer:	Compliance:
Members of the Legislative Assembly (87)	4 late filing warning letters issued. 1 MLA was issued an administrative penalty for late filing.
Designated Office Holders (44)	1 late letter was issued, no administrative penalties were issued.
Political staff (149)	23 late filing warning letters issued 6 political staff member were issued an administrative penalty for late filing.
Designated Senior Officials (14)	3 late letters were issued, 1 DSO was issued an administrative penalty.

REQUESTS FOR ADVICE

If Members, Designated Office Holders, Designated Senior Officials, or political staff seek and follow advice from the Ethics Commissioner, they are protected from prosecution for a breach of the *Conflicts of Interest Act*. Advice is typically given in writing.

Total Requests for Advice under the Conflicts of Interest Act



Breakdown of Requests for Advice

Types of Advice	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19
Gifts	80	110	267	280	253	219
Post-Employment	36	95	105	26	40	29
Outside Activities	26	19	17	12	20	26
Investments	22	13	24	19	7	35
Family	10	18	12	10	9	6
Constituency Issues	20	8	13	10	9	5
Codes of Conduct	3	5	26	2	0	22
Contracts with the Crown	10	9	10	7	2	0
Taking Part in Decisions	4	6	6	7	14	15
Conflicts of Interest/Other	9	27	57	41	38	21
Reviewing SO Appointments	14	10	3	15	7	19
Concurrent Employment	0	0	0	0	0	6
Total	242	320	540	429	399	403

Note: requests for advice pertaining to DSO concurrent employment only started in 2018-19 as a result of the amendments requiring Codes of Conduct be instituted by certain government agencies, boards and commissions.

Gifts

Questions are raised about accepting tickets to sporting events, invitations to fundraisers, invitations to conferences and non-commercial flights. Members are required to track all gifts over \$100, including event tickets, to ensure they have accurate records for yearly disclosure and are mindful of both the value of cumulative gifts they receive from one source in a reporting year and any connection between a source and the Member's public responsibilities.

Post-Employment

Post-employment questions arise from departing Ministers, Designated Office Holders, Designated Senior Officials and political staff.

Outside Activities

Questions regarding outside activities almost exclusively deal with volunteer board activities in community organizations and clarification on external business activities.

Investments

Investment requests relate to blind trusts and personal investments of the individual or their family. Where potential conflicts existed, appropriate steps were taken by the parties to remove themselves from the situation prior to a conflict arising.

Family

Questions involving family members involve either the employment or activities of a spouse or child.

Constituency Issues

Questions relate to assisting constituents, using the constituency allowance for social obligations within the constituency. Where questions about the Member's constituency allowance fall within the mandate of the Office of the Speaker, the Member is referred to Legislative Assembly Office.

Codes of Conduct

Several agencies, boards and commissions, seek informal confidential advice on conflict of interest matters relating to their agency's code of conduct.

Contracts

Contract questions are often raised by individuals about their dealings with Alberta Treasury Branch, and by others regarding other business, financial or Crown contracts.

Taking Part in Decisions

Generally, individuals consider their personal holdings and those of close family members and ask whether it is appropriate to participate in a decision before the Legislative Assembly or one of its committees, or before Executive Council or one of its committees. The Office of the Ethics Commissioner advises whether a private interest is involved or whether the matter is a general application which affects the Member only as a broad class of the public, thereby allowing the Member to participate and vote.

Conflicts of Interest/Other

This is a general category where requests for advice do not fall within the other categories but do fall within the general scope of the *Conflicts of Interest Act*.

Reviewing Senior Official Appointments and Vetting of Potential Board Member Appointments

Sometimes, as part of the screening and hiring process, potential conflicts of interest issues arise with certain candidates for certain senior government or board positions. In these cases, or in cases where

it is prudent to ensure there are no underlying conflict of interest issues, the Office of the Ethics Commissioner may review selected candidate's backgrounds and investment holdings to ensure there are no issues and provide related advice.

Concurrent Employment

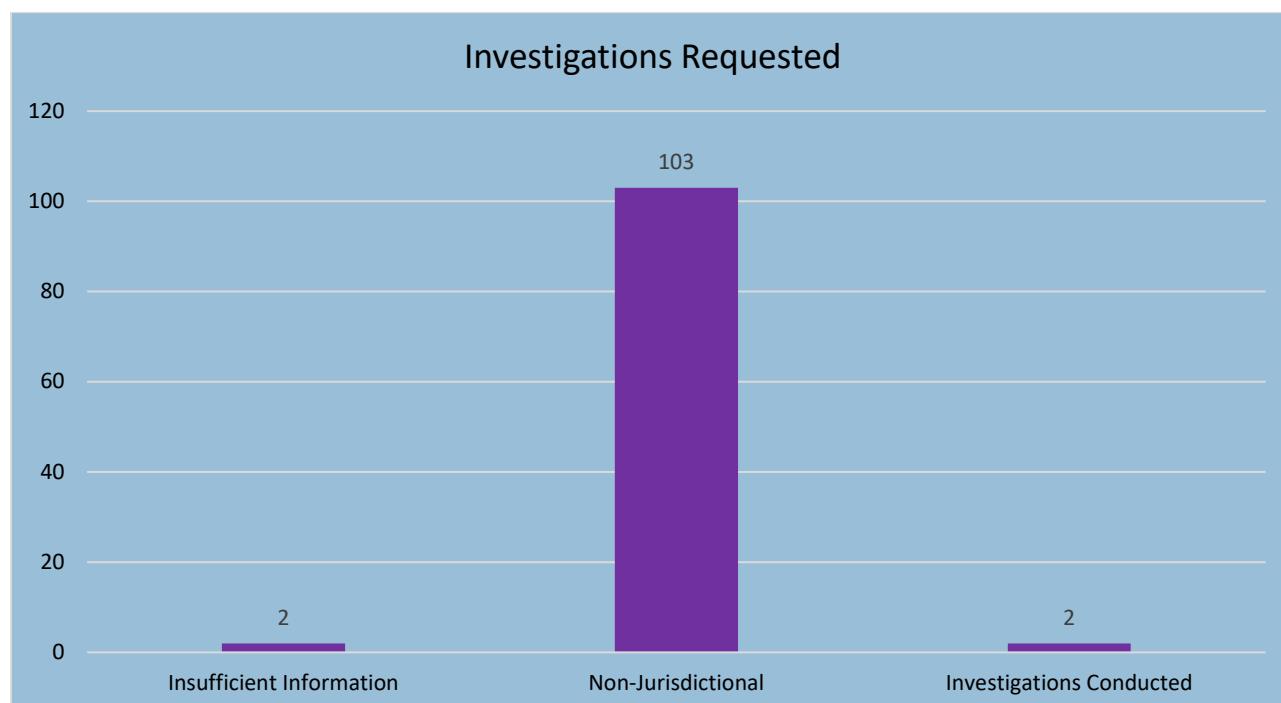
Beginning in 2018-19, Designated Senior Officials were required to obtain the Ethics Commissioner's approval for any outside employment.

REQUESTS FOR INVESTIGATION

Investigation requests, once received, are considered and then acted upon accordingly. If sufficient evidence and grounds are provided, and the issue is within the jurisdiction of the Office of the Ethics Commissioner, an investigation is conducted. If the request is vague or frivolous or contains overly broad allegations, and further relevant information is not provided upon request, the request is categorized as "insufficient information". If sufficient information is provided, but the request is determined to pertain to someone other than a Member, Designated Senior Official or political staffer, or is a complaint that does not fall within the scope of the *Conflicts of Interest Act*, it is classified as "non-jurisdictional".

The majority of requests for investigation involved matters that are outside the jurisdiction of the Office.

Request for Investigations by Category *Total: 107 (up from 105 last year)*



Of the 107 requests for investigation, the Office of the Ethics Commissioner found that the Office had jurisdiction on two requests. Investigation reports that were tabled in the Legislative Assembly can be found at: <http://www.ethicscommissioner.ab.ca/publications/investigation-reports/commissioner-trussler/>

REQUESTS FOR INFORMATION

The Office of the Ethics Commissioner received 27 requests for information this year, down from 36 the year prior. The majority of requests were from callers seeking clarification about the Office of the Ethics Commissioner's mandate and the relevant legislation. Information requested concerned employment standards, professional standards and conduct, Member compensation, post-employment, blind trusts, gift acceptance, public disclosure, conduct in non-profit organizations and legislation surrounding investigations. Callers who could not be assisted were referred, where possible, to the appropriate office that could answer the inquiry.

Total Requests Received for:	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19
Advice	242	320	540	429	399	403
Investigations	9	26	79	114	105	107
Information	140	23	30	60	36	27
TOTAL	391	369	649	603	540	537

BUDGET AND FISCAL UPDATE

The Office of the Ethics Commissioner continually ensures prudent expenditure of public funds and strives to find internal efficiencies and savings wherever possible and reasonable. As a result, the office's expenses last year were less than budgeted.

Full copies of the 2018-19 audited financial statements are located on the Office of the Ethics Commissioner website: <http://www.ethicscommissioner.ab.ca/publications/annual-reports/>.

	2016-17 Budget	2016-17 Actual	2017-18 Budget	2017-18 Actual	2018-19 Budget	2018-19 Actual
Salaries	\$697,000	\$718,673	\$709,000	\$687,391	\$748,000	\$730,103
Supplies and Expenses	\$433,000	\$287,540	\$240,000	\$185,623	\$222,000	\$181,870
Total	\$1,130,000	\$1,006,213	\$949,000	\$873,014	\$970,000	\$911,973
Surplus or (Deficit)	n/a	\$123,787	n/a	\$75,986	n/a	\$58,027

Note: budget figures do not include amortization costs as those are non-voted budget costs.

EVENTS AND CONFERENCES

In 2018-19, the Office of the Ethics Commissioner and Lobbyist Registrar attended the annual Canadian Conflicts of Interest Network Conference (CCOIN) in Newfoundland, and the Lobbyist Registrar attended the Lobbyist Registrar and Commissioner Network (LRCN) Annual Conference in Toronto.

Participating in annual conferences is very beneficial to further the work of the Office. Conferences provide the Office of the Ethics Commissioner the opportunity to exchange information with peers on issues of common interest and to review legislative and regulatory differences and trends.

PUBLICATIONS

A routine review of brochures and guides is undertaken each year to ensure they are current. Educational information is reviewed to ensure it is as user-friendly as possible. Brochures and bulletins on the public website are reviewed and updated as needed.

PUBLIC INTEREST DISCLOSURE ACT REPORTING

The Office of the Ethics Commissioner received zero disclosures, and conducted zero investigations, under the Public Interest Disclosure Act during the fiscal 2018-2019 reporting year.

LOBBYISTS ACT AND REGISTRY UPDATE

LEGISLATIVE REVIEW

On June 11, 2018, the Lobbyists Amendment Act, 2018 came into force. It resulted in a number of amendments to the Lobbyists Act, including the addition of a new prohibition on contingency fee payment arrangements for consultant lobbyists, a new ‘prohibited gifts’ provision restricting lobbyists’ ability to offer gifts, favours or other benefits to public office holders, a reduction in the organization lobbyist threshold, the removal of the exemption for submissions made in response to a request initiated by a public office holder for advice or comment, the addition of new exemptions for individuals who are recognized as elders by their aboriginal community and for individuals participating on certain boards, commissions, councils or other similar bodies established by a public office holder, the Government or a prescribed Provincial entity, the expansion of the Registrar’s power to include removal of a return from the Registry if a lobbyist does not comply with filing requirements, the expansion of information regarding government, government agency, and prescribed Provincial entity funding required to be disclosed in lobbyist returns, confirmation that grassroots communication is a form of lobbying, and changes to the definition of “public office holder” and to the list of prescribed Provincial entities.

To implement these legislative changes, this Office updated the Lobbyist Registry application and registration forms and published new and updated guidance documents, user guides and FAQ on the Lobbyist Registry website. We also updated the interactive *Do you think that you might be a lobbyist?* test on the Lobbyist Registry website to reflect the amendments. In addition, this Office issued three email notifications and reminders between April 1, 2018 and March 31, 2019 regarding the new ‘prohibited gifts’ provision to all individuals with an active user account in the Lobbyist Registry.

REQUESTS FOR INFORMATION AND GUIDANCE

In addition to the many requests for assistance with using the Lobbyist Registry application and website which we continued to receive and address, the Lobbyist Registrar continued to receive and respond to requests for information and guidance from lobbyists, potential lobbyists, and others about interpreting and applying the Lobbyists Act provisions. Responding to these requests by email or by phone (as appropriate) in a timely fashion was part of our proactive approach to achieving compliance with the Lobbyists Act and to reducing the amount of enforcement action required. We regularly addressed questions about:

- whether a particular organization or individual needs to be registered as a lobbyist;
- the applicable registration requirements;
- whether certain information must be disclosed in a registration and how to disclose the required information;
- whether certain activities constitute lobbying;
- the contracting prohibitions and the ‘prohibited gifts’ provision in the Lobbyists Act;
- how to set up an account in the Lobbyist Registry;
- how change a password, account user, or account information in the Lobbyist Registry;
- how to submit, update or terminate a registration.

There was a particular focus during the year on providing advice and information to lobbyists, upon request and as issues arose, regarding the new ‘prohibited gifts’ provision restricting lobbyists’ ability to offer gifts, favours or other benefits to public office holders.

Between April 1, 2018 and March 31, 2019, at least 204 requests for information or guidance about the interpretation and application of the *Lobbyists Act* and at least 241 requests for assistance with using the Lobbyist Registry application and website were received and addressed. These numbers are approximate and are based on internal efforts to track all requests received and answered.

INFORMATION ON FILING REGISTRATIONS

The Lobbyist Registrar continued to review registrations submitted to the Lobbyist Registry with a view to ensuring compliance with the applicable registration requirements.

Although, in general, the quality of lobbying activity descriptions in submitted registrations improved, there continued to be a focus on ensuring that the descriptions of lobbying activities in registrations were sufficiently detailed, clear, complete and up-to-date in respect of the client’s or the organization’s particular lobbying interests, activities and objectives.

There also continued to be a focus on ensuring that lobbyists accurately completed and updated the lobbyist information and the organization or client information required to be disclosed in their registrations in accordance with the *Lobbyists Act*. This included making inquiries of and following up with lobbyists to confirm that they identify all directors, officers, parent corporations and relevant subsidiaries where required, disclose government, government agency, and prescribed Provincial entity funding received or requested as required, and update the lists of current and former lobbyists as required. However, ultimately, lobbyists remain responsible for ensuring that the information that they provide in their registrations is complete, up-to-date and accurate.

As in previous years, this Office continued to issue courtesy reminders and notifications to *registered* lobbyists regarding their upcoming filing deadlines. A new additional service which we began this year is to issue courtesy email notifications to *unregistered* users (i) who had set up an account in the Registry but never created or filed any registrations or (ii) who had an account in the Registry and had created a draft registration but never completed or filed the draft. This new service is carried out with a view to assisting users with fulfilling any applicable filing obligations and with a view to preventing, at the earliest opportunity, potential breaches of the registration requirements in the Act. Ultimately, it remains lobbyists’ responsibility to ensure that they complete and submit any necessary registrations within the timelines required by the Act.

INVESTIGATIONS AND ENFORCEMENT

As part of our proactive approach to compliance, this Office continues to assist lobbyists with using the Lobbyist Registry, with complying with their registration requirements, and with understanding the various obligations and restrictions to which they are subject under the *Lobbyists Act*. Particular emphasis was placed during the year on issuing guidance and reminders to lobbyists regarding the new ‘prohibited gifts’ provision in the *Lobbyists Act* in order to prevent breaches. However, as always, lobbyists ultimately are responsible for ensuring that they are familiar and comply with their obligations under the Act and that the information they provide in their returns is forthright, complete and accurate.

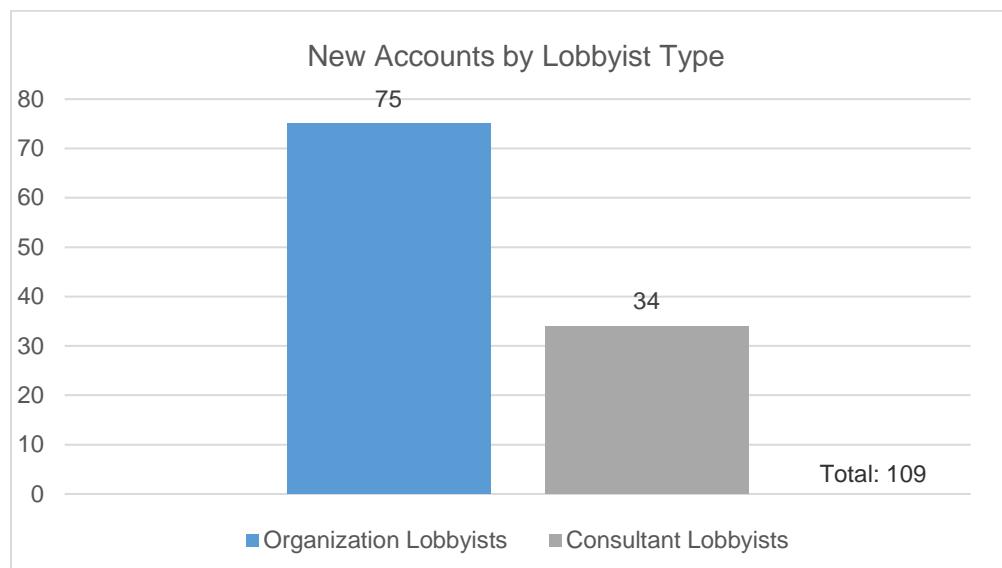
The Lobbyist Registrar and Ethics Commissioner have enforcement powers available to promote compliance with the Act, including the ability to remove a return from the Lobbyist Registry if a lobbyist does not comply with certain filing requirements under the Act, the ability to commence an investigation and/or impose an administrative penalty, and, if a lobbyist is convicted of an offence, the ability to impose a prohibition from lobbying and from filing or having a return filed for a period of up to two years.

Section 15 of the *Lobbyists Act* provides when the Lobbyist Registrar shall conduct an investigation and when the Registrar may refuse or cease to conduct an investigation. There were no formal requests for an investigation under the *Lobbyists Act* received from April 1, 2018 to March 31, 2019, although occasionally this Office received inquiries from the public about whether a particular organization should be registered as a lobbyist.

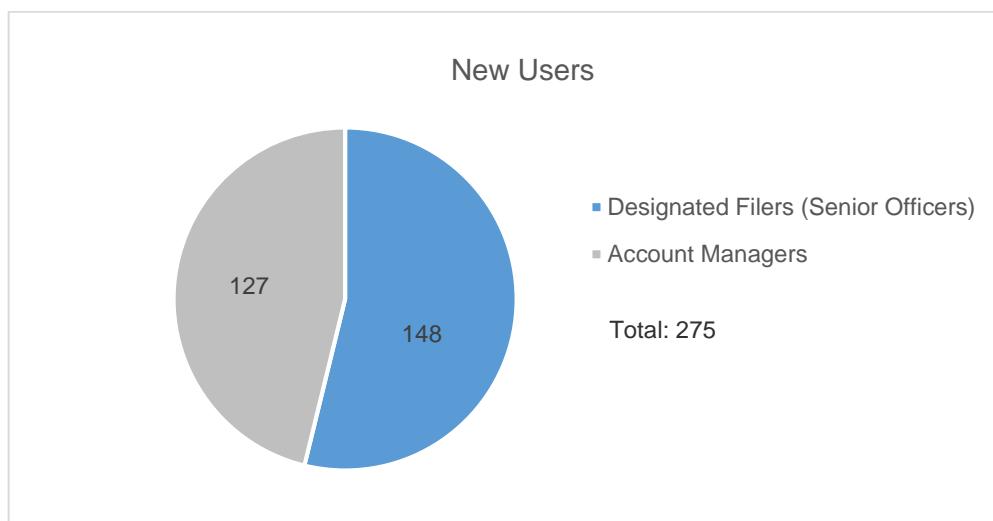
Six administrative penalties were issued and collected between April 1, 2018 and March 31, 2019, totaling \$7,086.00. Four of these penalties were issued in respect of breaches of the section 6.2 'prohibited gifts' provision and two were issued in respect of breaches of the registration requirement for consultant lobbyists.

STATISTICAL YEAR IN REVIEW

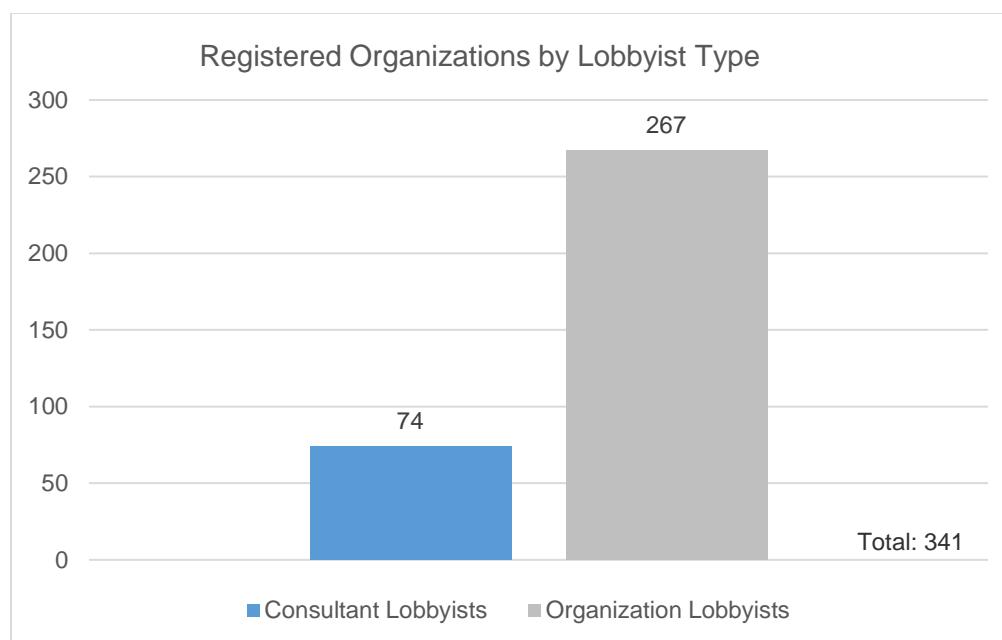
New Accounts by Lobbyist Type from April 1, 2018 - March 31, 2019



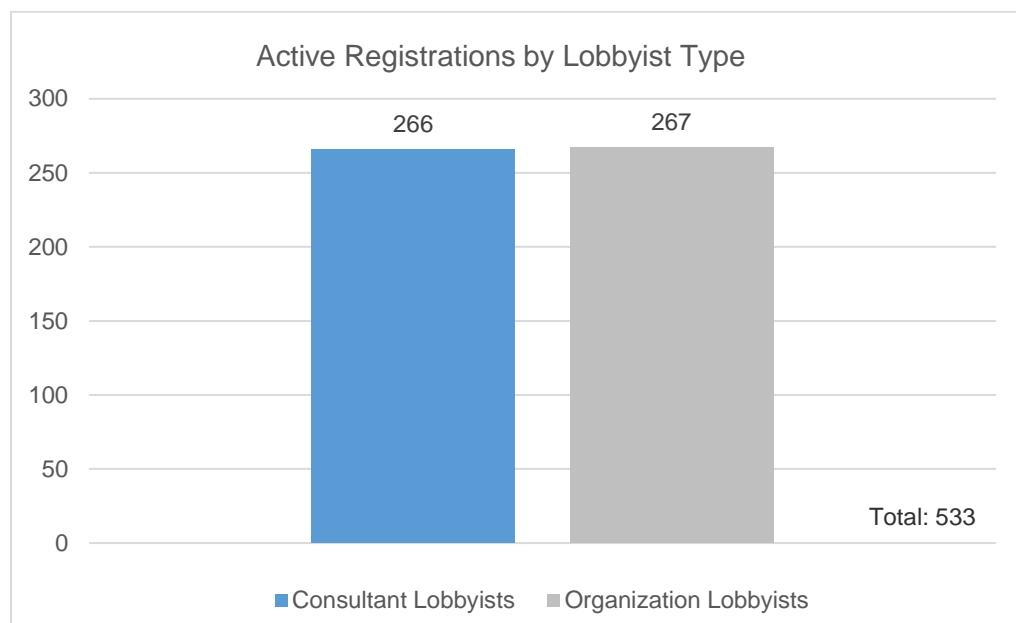
New Users from April 1, 2018 - March 31, 2019



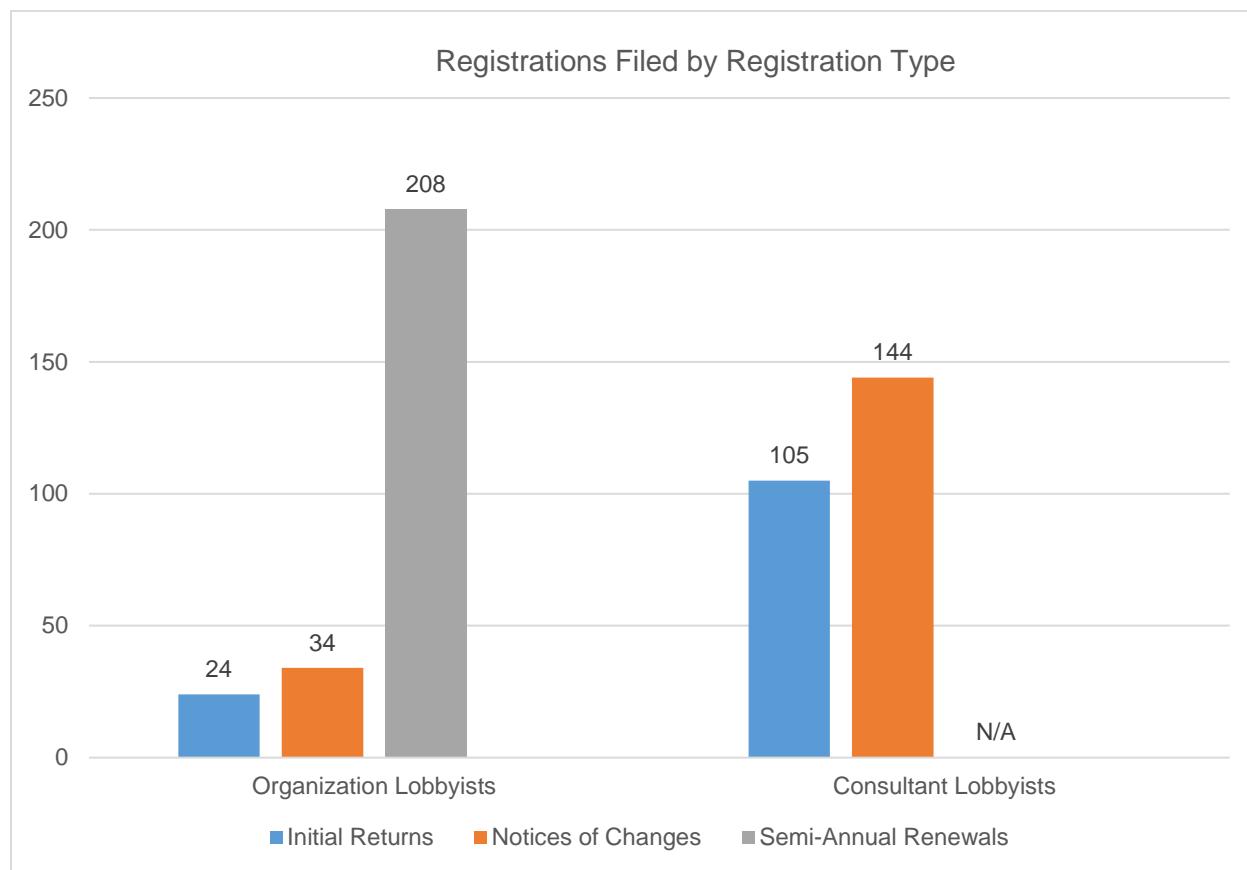
Registered Organizations by Lobbyist Type as of March 31, 2019



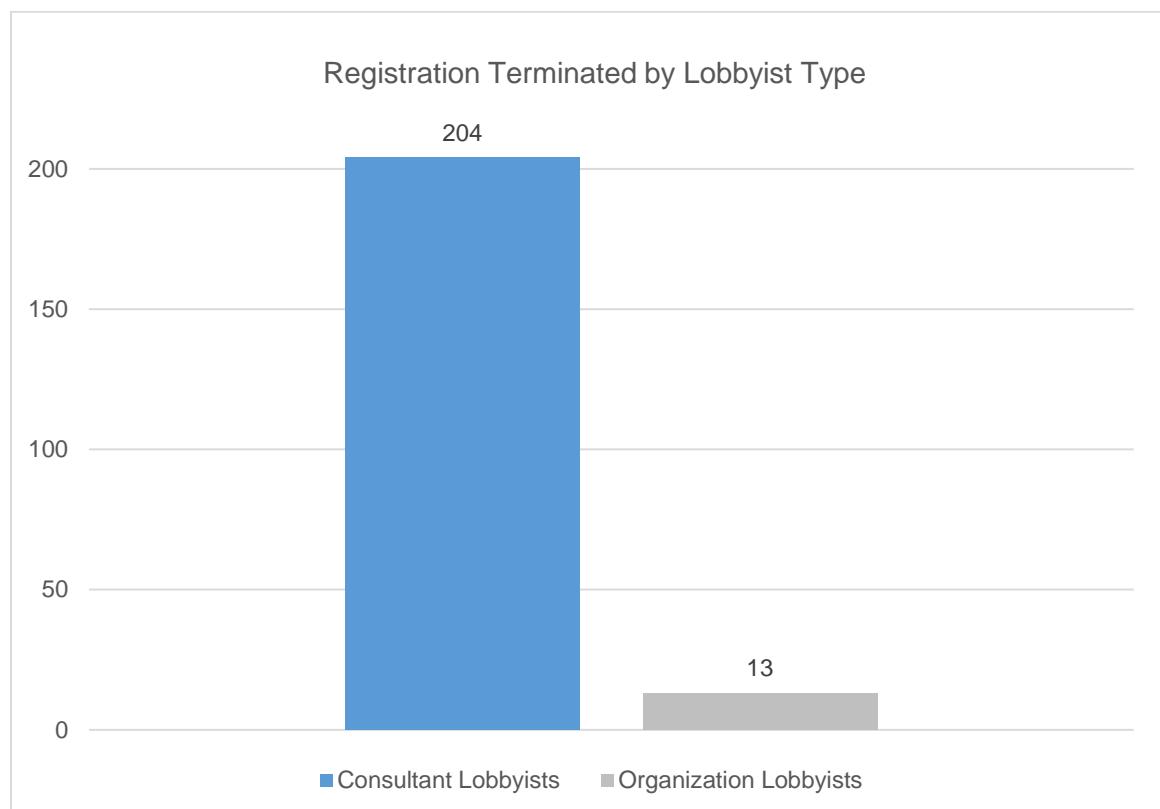
Active Registrations by Lobbyist Type as of March 31, 2019



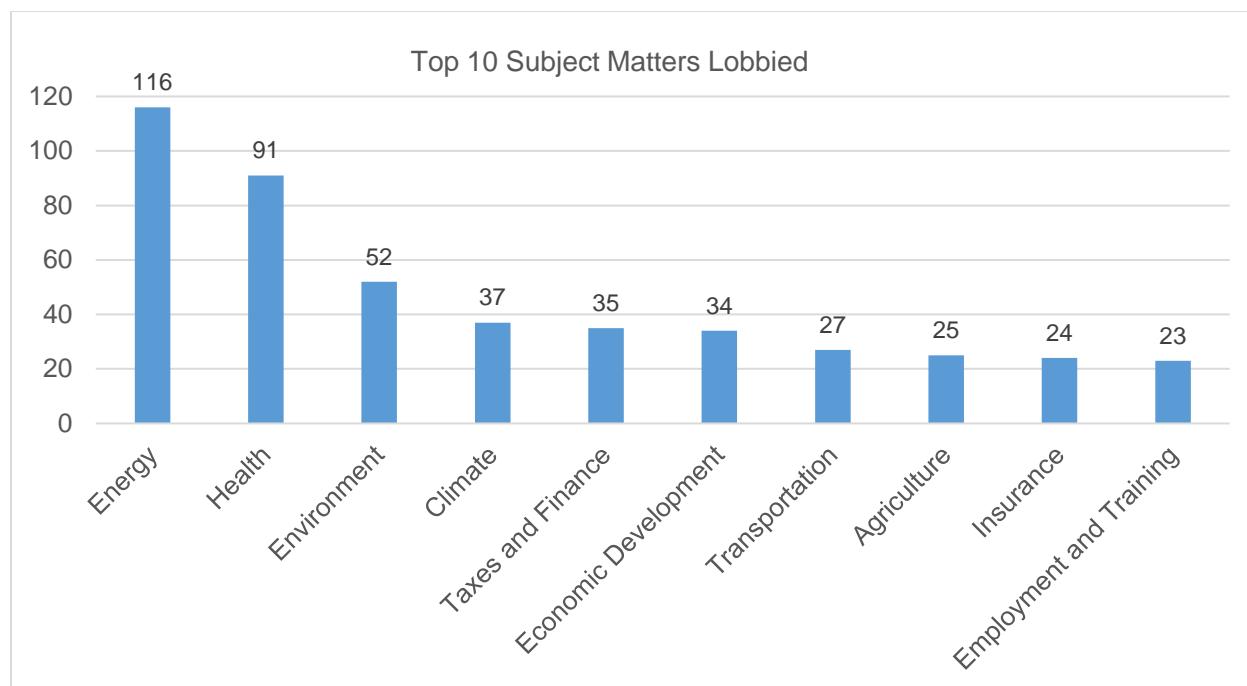
Registrations Filed from April 1, 2018 - March 31, 2019



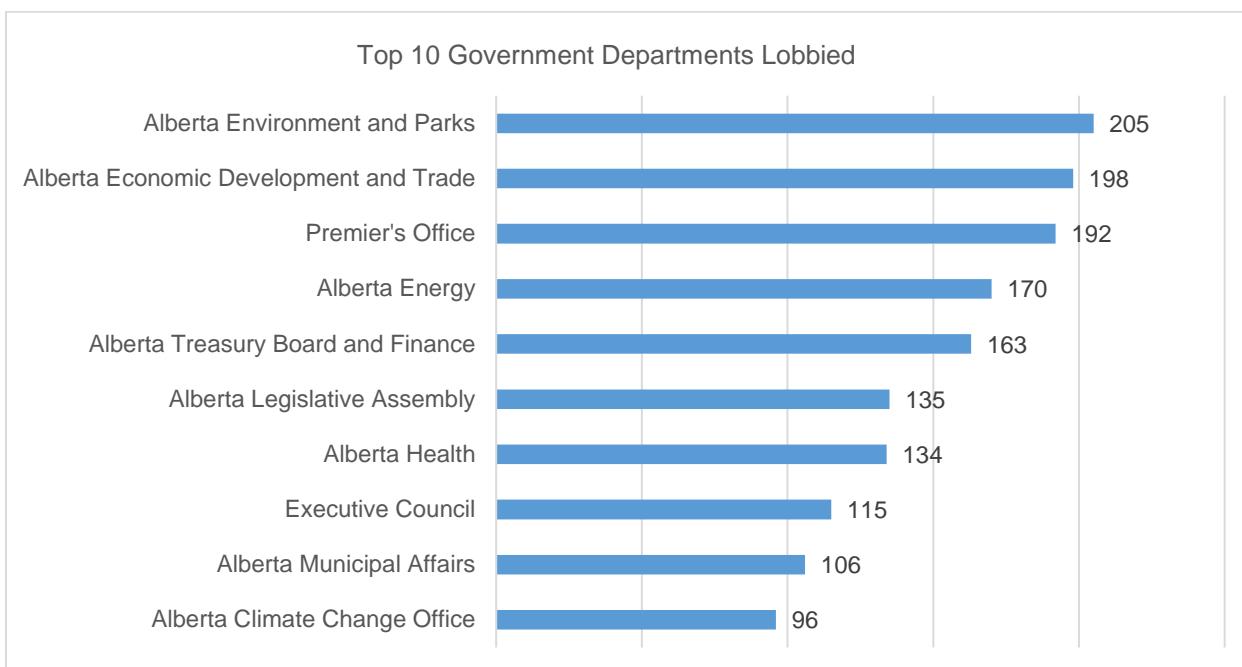
Registrations Terminated from April 1, 2018 - March 31, 2019



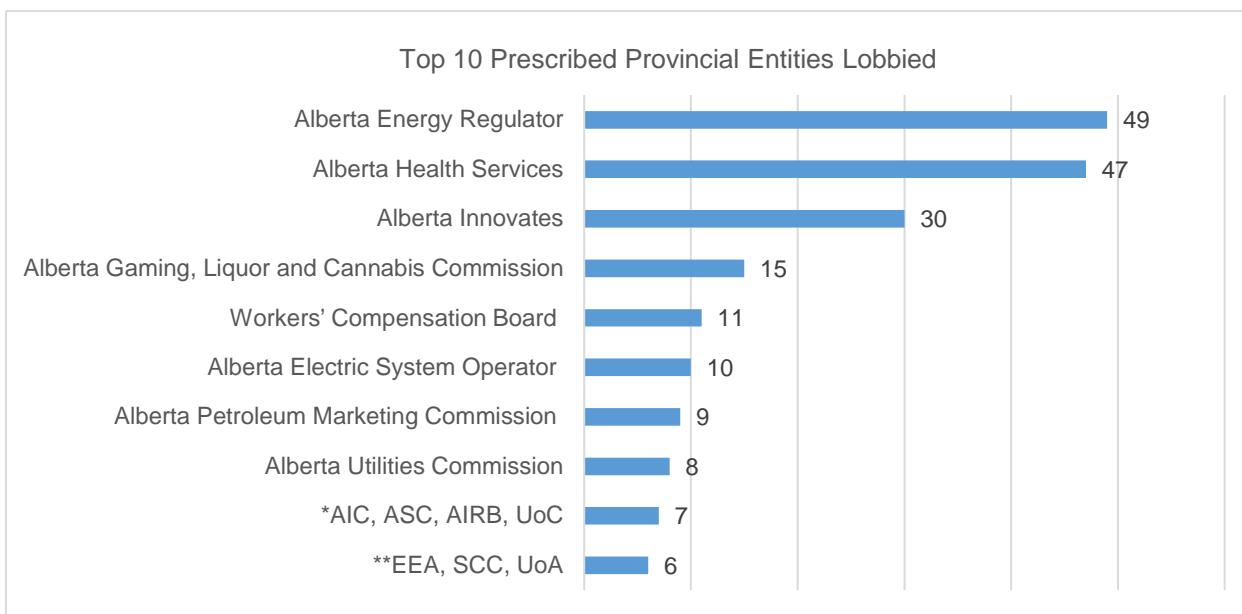
Active Registrations by Subject Matter as of March 31, 2019



Active Registrations by Government Departments Lobbied as of March 31, 2019



Active Registrations by Prescribed Provincial Entities Lobbied as of March 31, 2019

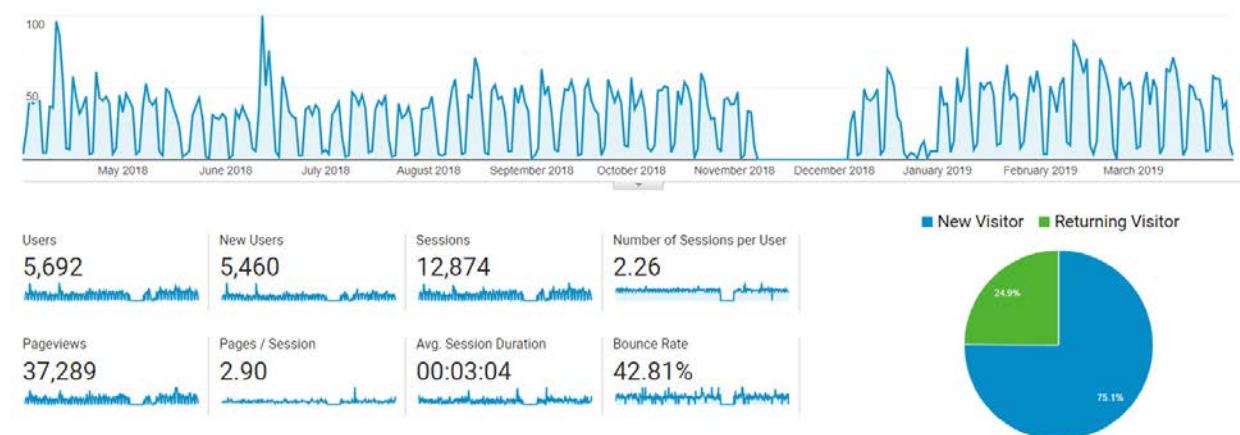


*Alberta Insurance Council, Alberta Securities Commission, Automobile Insurance Rate Board, The University of Calgary (tied)

**Energy Efficiency Alberta, Safety Codes Council, The University of Alberta (tied)

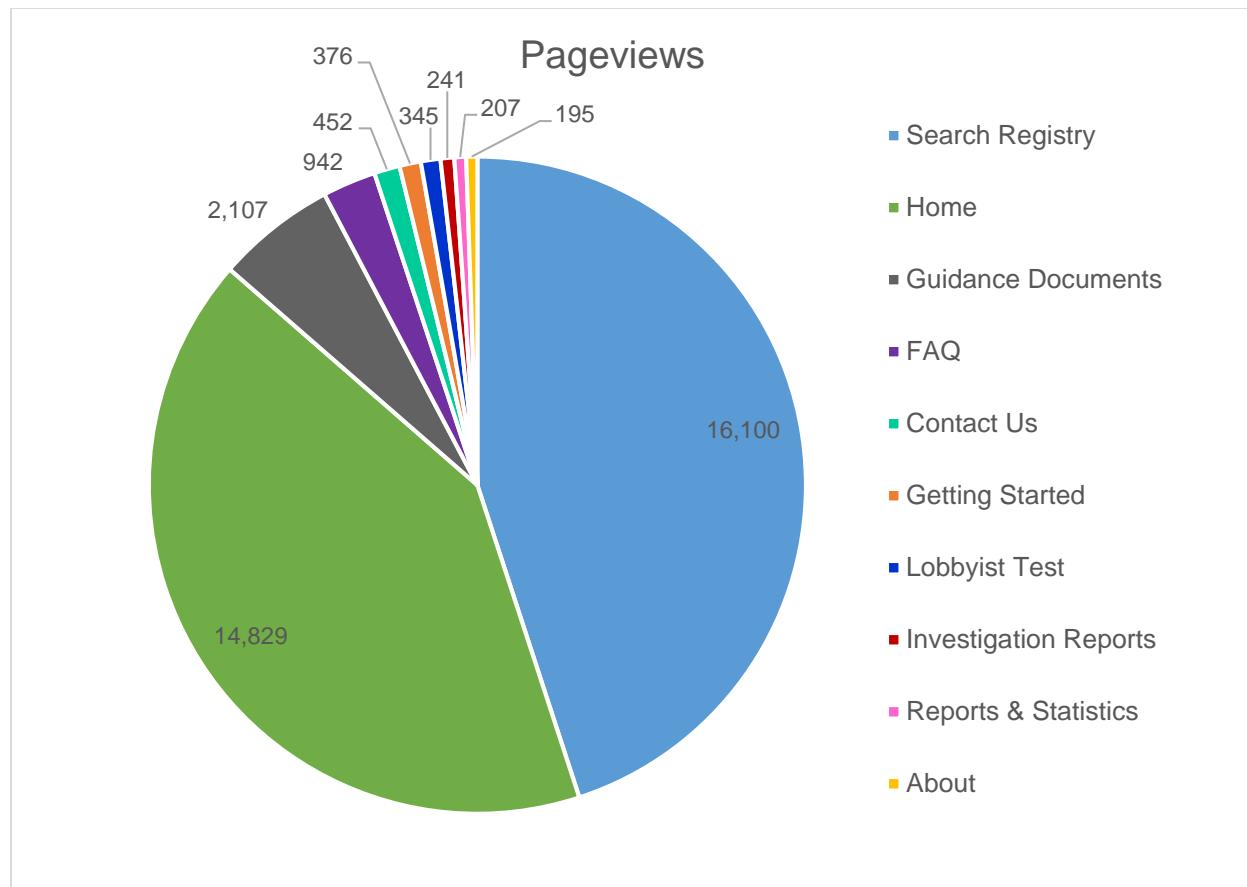
Lobbyist Registry Website Activity from April 1, 2018 - March 31, 2019

Audience Overview



* Web tracking service disruption during the month of November 2018. No data available.

Top 10 Webpages Viewed



<u>Legend</u>	<u>Definition</u>
Users	Users who have initiated at least one session during the date range.
New users	The number of first-time users during the selected date range.
Pageviews	Pageviews is the total number of pages viewed. Repeated views of a single page are counted.
Page Title	The webpage title used on the website.
Sessions	Total number of sessions within the date range. A session is a group of user interactions with our website that take place within a given time frame. For example a single session can contain multiple page views, events, and applications.
Pages	Pages is the average number of pages viewed during a session. Repeated views of a single page are counted.
Number of Sessions per User	The average number of sessions per user.
Bounce Rate	The percentage of single-page sessions in which there was no interaction with the page. A bounced session has a duration of 0 seconds. A high bounce rate indicates that website users land on one page and leave without clicking on anywhere else on the website.

LOOKING FORWARD

Since March 31, 2019, this Office continues to regularly update and enhance the information and resources available on the Lobbyist Registry website to ensure that they reflect the most useful and up-to-date information for lobbyists and other members of the public. We also are in the process of updating the Lobbyist Registry application to adhere to general ‘look and feel’ standards for applications (e.g. standard look and placement of help icons, sign-out button, home button, etc.), with a view to increasing ease of use. Additionally, this Office has revised the content in the help icons, the instructions, and the questions in the Lobbyist Registry registration forms for clarification purposes and to more readily elicit the necessary information from users.

We continue to issue reminders about the new ‘prohibited gifts’ provision as necessary to promote compliance. In addition, we have posted on the Lobbyist Registry website a fillable PDF *Gift, Favour or Other Benefit – Request for Guidance Form*, which lobbyists can use to request guidance from this Office about whether they can offer a particular contemplated gift, favour or benefit to a public office holder under section 6.2 of the *Lobbyists Act*.

Going forward, we plan to prepare a resource for public office holders to assist them in understanding when they are being lobbied. This would be for public office holders’ information purposes only, as public office holders themselves currently do not have any obligations under the *Lobbyists Act*. The aim would be to promote greater compliance with the *Lobbyists Act* through greater awareness of the *Lobbyists Act* in general.